REMARKS/ARGUMENTS

Claims 1-25 are pending in this Application.\

Claims 1, 6-8, 15, 19, and 21 are currently amended. Applicants submit that support for the claim amendments can be found throughout the specification and the drawings.

Claims 1-25 remain pending in the Application after entry of this Amendment. No new matter has been entered.

In the Office Action, claims 1-25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,549,612 to Gifford et al. (hereinafter "Gifford").

Claim Rejections Under 35 U.S. C. § 102(e)

Applicants respectfully traverse the rejections to claims 1-25 and request reconsideration and withdrawal of the rejections under 35 U.S.C. § 102(e) based on Gifford.

Applicants respectfully note that to anticipate a pending claim, a prior art reference must provide, either expressly or inherently, each and every limitation of the pending claim. (M.P.E.P. § 2131).

The Office Action alleges that Gifford teaches or suggests all of the claim limitations of claims 1-25. However, based on the arguments presented below, Applicants respectfully submit that Gifford fails to teach or suggest one or more of the claim limitations recited in each of claims 1-25.

In various embodiments, an actionable message maybe sent to a device that includes a text message that identifies action identifiers, actions, and/or message identifiers. (Application: Paragraph [0026]). The text message may also include content other than text, such as images, markup, etc. In one example, the text message may be a plain text format, a markup language, etc. In some embodiments, information that directly links back to information stored in an actionable message manager _may not be included_ in the actionable message. For example, links with embedded information, such as URLs that are embedded in a web document, that, when selected, directly link back to information _may not be sent_ with the actionable message. If direct links to the stored information are not included, an actionable message

manager may be configured <u>to determine stored information from information in the response</u> <u>message</u>.

When an actionable message is sent to a device, if there are <u>no direct links</u> back to information stored in an actionable message manager (e.g., URLs), the message, if responded to, <u>may include the identifier for the actionable message</u>. (Application: Paragraph [0027]). The identifier may then be used to <u>determine the stored information</u>. In this case, the state of the sent actionable message may be retrieved when a response message is received. Additionally, the identifiers for the one or more actions, if invoked using the actionable message, may not be directly compatible with an application. For example, the identifiers merely identify that a certain action should be performed. Information associated with the identifier <u>in the stored</u> <u>information</u> is used to determine which action to perform and how to perform the action. For example, an actionable message manager may use the stored information to send an instruction to the application to perform an action. Thus, the actionable message manager may act as an intermediary for a device that needs to access the application.

Some of these features are recited in the claims. For example, amended claim 1 recites storing information associating one or more actions with a message. The stored information recited in amended claim 1 includes action information corresponding to one or more actions that enables applications to perform the one or more actions. Amended claim 1 further recites retrieving the stored information using a message identifier received in a response message. The action is then performed as recited in amended claim 1 using action information determined from the stored information using an action identifier from the received message.

Therefore, a message sent to a device as recited in amended claim 1 does not require a link or URL directly back to a web server in order to perform an action as discussed above. The information that enables the application to perform an action is retrieved as recited in amended claim 1 based on information associating the message identifier received in a response message with the action. Gifford fails to disclose retrieving stored information associating one or more actions with a message as recited in amended claim 1 using a message identifier that includes action information that enables an application to performed an action.

The Office Action alleges that Gifford discloses the feature recited in amended claim 1 of retrieving stored information using a message identifier received in a response message from a device in Col. 5, lines 19-21. Applicants respectfully disagree.

In Col. 5, lines 19-21, Gifford discloses merely discloses unique identification of a submitting party when a request is made to a back-end server. Thus, an identifier of a party in a response is different from a message identifier as recited in amended claim 1. For example, the server in Gifford may receive a request in the form of a direct URL, such as "www.tpsinc.com/UCServer/paybill?cid=XYZ123&billid=4598732." Gifford explains that "cid" and "billid" are the customer and billing identification tags. However, Gifford fails to disclose that the "cid" and the "billid" are message identifiers as recited in claim 1.

Accordingly, Applicants respectfully submit that Gifford fails to disclose each and every claim limitation recited in amended claim 1. Therefore, Applicants respectfully submit that amended claim 1 is allowable over the cited references.

Moreover, Gifford fails to disclose storing information associating a message with one or more actions as recited in the claims. For example, amended claim 8 recites the feature of generating a mapping between a message identifier and one or more actions. The Office Action points to Col. 4, lines 45-57 and Col. 5, lines 14-19 of Gifford as allegedly disclosing the above feature. Applicants respectfully disagree.

In Col. 4, lines 45-57, Gifford merely discloses that a brokerage company may maintain a registry of subscribers and options/stock price thresholds. However, Gifford does not disclose that the registry includes a mapping between a message identifier and one or more actions as recited in amended claim 8. Moreover, in Col. 5, lines 14-19, Gifford merely discloses unique identification of a submitting party when a request is made to a back-end server as discussed above.

Additionally, in Gifford, when a stock or option price crosses corresponding threshold, the brokerage company sends an enriched e-mail notification to the corresponding client showing which stock or option crossed its threshold. The notification e-mail includes not only information on what triggered the e-mail, it also includes the online interface that links to a web brokerage application. That application then allows the client to buy or sell the stock/option

by clicking on the appropriate button(s), hyperlink(s), or control(s) in the interface included in the e-mail. Thus, Gifford fails to disclose generating a mapping between a message identifier and one or more actions as recited in amended claim 8 because Gifford suggests using direct links to a web application rather than the mapping as recited in amended claim 8 used to retrieve stored information that enables the action to be performed based on the message identifier.

Accordingly, Applicants respectfully submit that Gifford fails to disclose each and every claim limitation recited in amended claim 8. Therefore, Applicants respectfully submit that amended claim 8is allowable over the cited references.

Furthermore, Gifford fails to disclose an action determiner configured to retrieve at least a portion of stored information for an identified action in response to a message identifier received in a response message as recited in amended claim 15. The stored information associates a message uniquely identified by the message identifier with one or more actions. The Office Action alleges that Gifford discloses an action determine as recited in amended claim 15 in Col. 5, lines 14-23. Applicants respectfully disagree.

In Col. 5, lines 14-23, Gifford again discloses that a server in Gifford may receive a request in the form of a direct URL, such as "www.tpsinc.com/UCServer/paybill?cid=XYZ123&billid=4598732." However, Gifford fails to disclose an action determiner as recited in amended claim 15 that retrieves at least a portion of stored information for an identified action in response to a message identifier received in a response message. The server in Gifford identifies the action to pay the bill because the action is directly specified in the URL (i.e., "paybill?"). Gifford fails to disclose that the server retrieves stored information for the paybill action in response to a message identifier in the URL. As discussed above, the "cid" and "billid" identify a customer and bill, which are used substantially different than the message identifier as recited in amended claim 15.

Applicants respectfully submit that independent claims 8, 15, and 21 are allowable for at least a similar rationale as discussed above for the allowability of claim 1, and others. Applicants respectfully submit that dependent claims 2-7, 9-14, 16-20, and 22-25 that depend directly and/or indirectly from the independent claims 1, 8, 15, and 21 respectively, are also allowable for at least a similar rationale as discussed above for the allowability of the

independent claims. Applicants further respectfully submit that the dependent claims recite additional features that make the dependent claims allowable for additional reasons.

Unless otherwise specified, amendments to the claims are made for the purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof.

While Applicants do not necessarily agree with the prior art rejections set forth in the Office Action, these amendments may be made to expedite issuance of the Application. Applicants reserve the right to pursue claims to subject matter similar to those pending before the present Amendment in co-pending or subsequent applications.

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Amdt. dated July 2, 2008
Reply to Office Action of April 15, 2008

PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

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